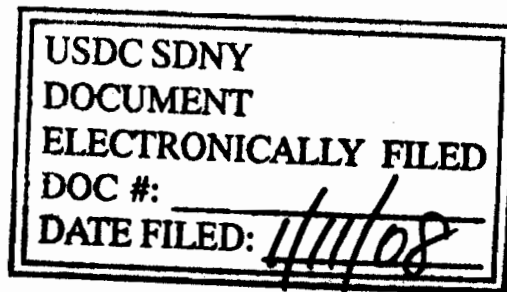


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



SAADYA MASTAFA, *et al.*,

Plaintiffs,

vs.

AUSTRALIAN WHEAT BOARD LIMITED,
et al.,

Defendants.

07 CV 7955 (GEL)

ECF CASE

STIPULATION AND
~~PROPOSED~~ ORDER

Plaintiffs and Defendants, by their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, in accordance with the schedule set forth in the Stipulation and Order so ordered by this Court on November 13, 2007, each of the Defendants filed a motion to dismiss this case on December 14, 2007; and

WHEREAS, in accordance with the schedule set forth in the Stipulation and Order so ordered by this Court on November 13, 2007, Plaintiffs' papers in opposition to each Defendant's motion to dismiss are currently due to be served and filed on or before January 25, 2008, and each Defendant's reply papers in further support of its motion to dismiss are currently due to be served and filed on or before February 22, 2008; and

WHEREAS, Plaintiffs' counsel has requested additional time (specifically, a four-week extension) to serve and file papers in opposition to each Defendant's motion to dismiss; and

WHEREAS, this is the first request for a continuance of the time for filing Plaintiffs' opposition papers; and

WHEREAS, counsel for Plaintiffs and counsel for Defendants have discussed Plaintiffs' counsel's request for additional time, and a resulting proposed revised briefing schedule, and Defendants do not object to Plaintiffs' counsel's request.


NOW, THEREFORE, IT IS HEREBY STIPULATED by and among the undersigned counsel for all parties herein, subject to approval by this Court, as follows:

1. Plaintiffs' memorandum of law in opposition to each Defendant's motion to dismiss shall be served and filed on or before February 22, 2008.
2. Each Defendant's reply memorandum of law in further support of its motion to dismiss shall be served and filed on or before April 7, 2008.
3. Within 14 days following the resolution of all motions pursuant to Fed. R. Civ. P. 12(b), unless this action shall have been dismissed in its entirety, counsel for all parties remaining in the action shall meet and confer regarding a proposed schedule for (a) Fed. R. Civ. P. 26(a)(1) disclosures, (b) discovery with respect to class certification issues, and (c) discovery with respect to the merits of the action, and a proposed Civil Case Management Plan ("CCMP"). Within 10 days thereafter, the parties shall submit an agreed CCMP for the Court's approval or, if there are any disagreements with respect to the matters to be addressed in the CCMP, shall submit such disputes to the Court for resolution. This Stipulation shall not waive or prejudice the right of Plaintiffs to seek appropriate discovery in connection with this Court's consideration of a motion to dismiss pursuant to Fed. R. Civ. P. 12(b) with respect to a matter that is raised by any defendant as a ground for such a motion.
4. All other provisions of the Stipulation and Order so ordered by this Court on November 13, 2007, not expressly altered herein shall remain in full force and effect.

Dated: January 8, 2008

Respectfully submitted,

MURRAY & MURRAY CO., L.P.A.

By 
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**Counsel for Defendants AWB Limited and AWB
(U.S.A.) Limited**

Dated: January ____, 2008

Respectfully submitted,

MURRAY & MURRAY CO., L.P.A.

By _____

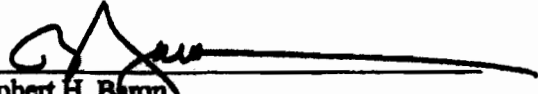
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LLP

By 

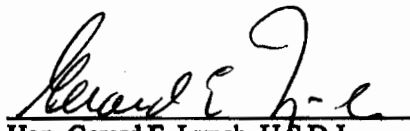
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Counsel for Defendant BNP Paribas

SO ORDERED:


Hon. Gerard E. Lynch, U.S.D.J.

1/10/08